

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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METLIFE LIFE AND ANNUITY COMPANY
OF CONNECTICUT,

Plaintiff,

**DEFENDANT
DELIO'S
PROPOSED
JURY VOIR
DIRE**

-against-

ANA NICOLE DELIO; ZACHARY FARRELL
SOBIE; BRIAN SOBIE, individually, as TRUSTEE
Of the ZACHARY FARRELL SOBIE GRANDCHILD
TRUST, and as CO TRUSTEE of the ANA NICOLE
DELIO GRANDCHILD TRUST; and MICHAEL
MENDELSON as CO TRUSTEE OF THE ANA
NICOLE DELIO GRANDCHILD TRUST

**07 Civ 7215
(KARAS, J.)**

Defendants

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Defendant, Ana Nicole Delio, by her attorney, James R. Carcano Esq., proposes
the following questions for the Court's voir dire of the jury panel:

1. Biographical information including place of residence, years at current residence, marital status, number of children, number of persons residing with juror, and highest level of education.
2. Current occupation and job responsibilities including name of employer.
3. Occupations of other adults in juror's household.
4. Gender and age of juror's children.
5. Juror's current hobbies, recreational activities, and involvement in civic and or social organizations.

6. Has the juror served on a jury before? If so when, what type of case, what type of jury, and did the jury reach a verdict?
7. Has the juror or someone close to the juror been convicted of a crime?
8. Is the juror familiar with the lawyers or parties in the case?
9. Is the juror familiar with the following potential witnesses

Stanley E. Bulua Esq. or his firm Danziger and Markhoff LLP

Alan Badie, CPA or his firm Citrin & Cooperman

Michael Mendelsohn

Aaron Saperstein of Wachovia Securities?
10. Has the juror or a close friend or relative been employed in the insurance business or a company involved in the issuance or management of annuities or life insurance policies?
11. Is the juror or a close friend or relative an officer, partner, shareholder, or director of an insurance or annuity company?
12. Has the juror or a close friend or relative served as an executor, trustee, or fiduciary of an estate?
13. Has the juror or a close friend or relative been involved in a similar lawsuit such as this case? If so, was it resolved to the juror's satisfaction.
14. Has the juror or a close friend or relative been involved in litigation in Surrogate's Court? If so, was it resolved to the juror's satisfaction?
15. **For juror's with past litigation experience:** did anything occur during that trial which would tend to influence you for or against any party in this case?

16. Has the juror had any past experiences which would prevent the juror from deciding this case?
17. Does the juror know of any reason that the Court has not asked about why the juror cannot be a fair and impartial juror for both sides in this case?

Dated: Larchmont, New York
April 9, 2008

James R. Carcano (JC 3310)
Attorney for Defendant DELIO
15 Hudson Place
Larchmont, New York 10538
(914) 833-2695

TO: Alvin Pasternak, Esq,
MetLife Life and Annuity Company of CT
27-01 Queens Plaza North
Long Island City, New York 11101

NOEL W. HAUSER, ESQ.
270 Madison Avenue
New York, New York 10016

